

CALIFORNIA ENERGY COMMISSION1516 NINTH STREET
SACRAMENTO, CA 95814-5512

April 10, 2009

Mr. Ken Speer, Assistant General Manager
Northern California Power Agency
108 Cirby Way
Roseville, CA 95678**RE: LODI ENERGY CENTER PROJECT (08-AFC-10)
DATA REQUEST SET 4 (#s 75 - 78)**

| | |
|------------------|-------------|
| DOCKET | |
| 08-AFC-10 | |
| DATE | APR 10 2009 |
| RECD. | APR 10 2009 |

Dear Mr. Speer:

Pursuant to Title 20, California Code of Regulations, Section 1716, the California Energy Commission staff seeks the information specified in the enclosed data request. The information requested is necessary to: 1) more fully understand the project, 2) assess whether the facility will be constructed and operated in compliance with applicable regulations, 3) assess whether the project will result in significant environmental impacts, 4) assess whether the facilities will be constructed and operated in a safe, efficient and reliable manner, and 5) assess potential mitigation measures.

This set of data requests (set 4, #s 75-78) is being made in the area of worker safety/fire protection. The information provided will allow staff to properly assess the on-site fire suppression systems and emergency response access and consider necessary and appropriate Conditions of Certification to protect workers, critical energy infrastructure, and the off-site public. We would appreciate written responses to the enclosed data requests on or before May 9, 2009, or at such date as may be mutually agreeable.

If you are unable to provide the specific information requested, need additional time, or object to providing requested/specific information, please send a written notice to both Commissioner Karen Douglas, Presiding Committee Member for the Lodi Energy Center Project, and to me, within 20 days of receipt of this letter. If sent, this notification must contain the reason(s) for not providing the information, the need for additional time, and the grounds for any objections (see Title 20, California Code of Regulations, section 1716 (f)).

If you have any questions, please call me at (916) 654-5191 or email me at rjones@energy.state.ca.us.

Sincerely,

Original signed by
Rod Jones
Project ManagerEnclosure
cc: Docket (08-AFC-10) and POS

LODI ENERGY CENTER (08-AFC-10)

DATA REQUEST SET 4

Technical Area: Worker Safety/Fire Protection
Author: Dr. Alvin Greenberg

BACKGROUND

Sections 2.1.2.1 and 2.1.14 of the Application For Certification (AFC) states that the Lodi Energy Center (LEC) will share the firewater storage tank, fire-loop system and fire pumps with the existing Combustion Turbine Plant (CTP # 2), and that the system would be sized to provide two hours of fire protection according to National Fire Protection Association guidelines. However, the AFC appears to provide no specific information on the amount of water dedicated for fire protection and the types of pumps that maintain pressure in the fire loop system.

And, although the AFC contains a description of construction fire suppression systems in section 5.16.2.3.1, the systems appear to be limited to "portable fire extinguishers" and "fixed firefighting equipment" and no mention is made regarding the details or identity of the proposed fixed firefighting equipment.

Further, section 2.1.1 of the AFC states that the primary access to the site will be located at North Thornton Road. No secondary access to the site is described. Figure 2.1-3 (an aerial photo of the site) shows two potential access roads to the site, but neither is labeled. All power plants certified by the Energy Commission must comply with all Laws, Ordinances, Regulations and Standards and having two access points is a requirement.

Finally, the AFC states that the existing fire water system and emergency fire water pump will provide water for fire-fighting to both the existing CTP #2 facility and the proposed LEC. Yet, information is lacking that ensures that the entire storage system, water flows, and emergency pumps can provide the needed flow, pressure, and duration of flow (minimum of 2 hours) for both the CTP #2 and LEC facilities at the same time should a concurrent fire at both power plants require fire-fighting water.

Staff is requesting information in order to properly assess the on-site fire suppression systems and emergency response access and to consider necessary and appropriate Conditions of Certification to protect workers, critical energy infrastructure, and the off-site public.

DATA REQUESTS

75. Please provide specific information on the amount of stored water dedicated for fire protection and the types of pumps that maintain pressure in the fire loop system.
76. Please provide the details and identity of the proposed fixed firefighting equipment that will be on-site during the construction phase.
77. Please describe the gates and locations of the primary and secondary access points to the power plant and the mechanism by which emergency responders will be able to enter at either location should power plant personnel not be available.
78. Please provide a technical evaluation that ensures that the entire fire water storage system, water flows, and emergency pumps can provide the needed flow, pressure, and duration of flow (minimum of 2 hours) for both the CTP#2 and LEC facilities at the same time should a concurrent fire at both power plants require fire-fighting water.



**BEFORE THE ENERGY RESOURCES CONSERVATION AND DEVELOPMENT
COMMISSION OF THE STATE OF CALIFORNIA
1516 NINTH STREET, SACRAMENTO, CA 95814
1-800-822-6228 – WWW.ENERGY.CA.GOV**

**APPLICATION FOR CERTIFICATION
FOR THE *Lodi Energy Center***

DOCKET No. 08-AFC-10

**PROOF OF SERVICE
(Revised 2/17/09)**

APPLICANT

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INTERESTED AGENCIES

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INTERVENORS

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DECLARATION OF SERVICE

I, April Albright, declare that on April 10, 2009, I served and filed copies of the attached Lodi Energy Center Project (08-AFC-10) Data Request Set 4 (#s 75 -78), dated April 10, 2009. The original documents, filed with the Docket Unit, are accompanied by a copy of the most recent Proof of Service list, located on the web page for this project at:

[www.energy.ca.gov/sitingcases/lodi]. The documents have been sent to both the other parties in this proceeding (as shown on the Proof of Service list) and to the Commission's Docket Unit, in the following manner:

(Check all that Apply)

FOR SERVICE TO ALL OTHER PARTIES:

- sent electronically to all email addresses on the Proof of Service list;

- by personal delivery or by depositing in the United States mail at Sacramento, California with first-class postage thereon fully prepaid and addressed as provided on the Proof of Service list above to those addresses **NOT** marked "email preferred."

AND

FOR FILING WITH THE ENERGY COMMISSION:

- sending an original paper copy and one electronic copy, mailed and emailed respectively, to the address below (preferred method);

OR

- depositing in the mail an original and 12 paper copies, as follows:

CALIFORNIA ENERGY COMMISSION

Attn: Docket No. 08-AFC-10
1516 Ninth Street, MS-4
Sacramento, CA 95814-5512

docket@energy.state.ca.us

I declare under penalty of perjury that the foregoing is true and correct.

Original signed by _____
April Albright